

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

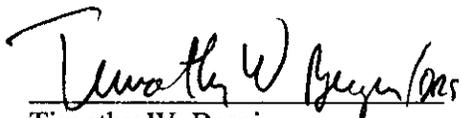
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001)
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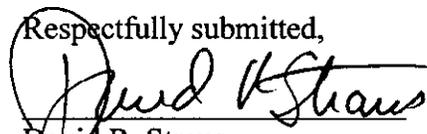
Docket No. R2001-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS OF AMERICAN BUSINESS MEDIA
AND THE MCGRAW-HILL COMPANIES DIRECTED TO THE UNITED
STATES POSTAL SERVICE WITNESS VIRGINIA J. MAYES
(ABM-MH/USPS-T23-1-5)**

Pursuant to the Commission's Rules of Practice, American Business Media and The McGraw-Hill Companies, Inc. hereby submit the attached interrogatories and requests for production of documents to the United States Postal Service witness Mayes (ABM-MH/USPS-T23-1-5). If any request should be answered by a different witness, it should be referred to that witness.


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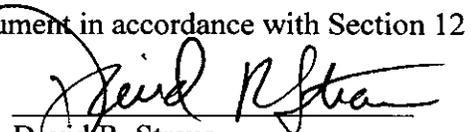
Counsel for The McGraw-Hill
Companies, Inc.

Respectfully submitted,

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Counsel for American Business Media

CERTIFICATE OF SERVICE

I hereby certify that I have this date served this document in accordance with Section 12 of the Commission's Rules of Practice.


David R. Straus

Dated: November 26, 2001

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ABM-MH/USPS-T23-1. At lines 13-15 of page 7 of USPS-T-23, witness Mayes states: “In previous proceedings, the Postal Service has estimated that non-destination SCF Zone 1&2 Periodicals will incur one transfer through a non-destination transfer hub before it is dispatched to the appropriate destination SCF.” With respect to this statement, please provide all studies or documents from prior proceedings that support this assumption. Please confirm that, in this proceeding, the USPS is presenting no new studies or other new evidence in support of this assumption.

ABM-MH/USPS-T23-2. At lines 19-21 of page 7 of USPS-T-23, witness Mayes states: “In previous proceedings, it has been assumed that 20 percent of non-destination SCF Zone 1&2 Periodicals incur a trip through a non-destination SCF/ADC before being dispatched to the destination SCF.” With respect to this statement, please provide all studies or documents from prior proceedings that support this assumption. Please confirm that, in this proceeding, the USPS is presenting no new studies or other new evidence in support of this assumption.

ABM-MH/USPS-T23-3. At lines 21-24 of page 7 of USPS-T-23, witness Mayes states: “It has also been assumed that 3.14 percent of non-destination SCF Zone 1&2 Periodicals go directly from the destination transfer hub to the destination DDU, bypassing intermediate handlings at the destination ADC or destination SCF.” With respect to this statement, please provide all studies or documents from prior proceedings that support this assumption. Please confirm that, in this proceeding, the USPS is presenting no new studies or other new evidence in support of this assumption.

ABM-MH/USPS-T23-4. At lines 25-28 of page 7 of USPS-T-23, witness Mayes states: “In Docket No. R2000-1, witness Stralberg testified on behalf of the Publishing Mailers that the dropship cost avoidance models should be adjusted to account for the fact that mailers are expected to unload their own trucks when they drop Periodicals at destination delivery units.” With respect to this statement, please list all activities that publishing mailers of periodicals are now expected to perform at each of the following facilities: Destination Delivery Units, Destination SCFs, Destination ADCs and other non-destination entry facilities.

ABM-MH/USPS-T-23-5. At lines 13-15 of page 8 of USPS-T-23, witness Mayes presents her estimates of Periodicals non-transportation dropship cost savings on both a per piece and per pound basis. With respect to this presentation, please confirm whether, in Ms. Mayes’ view, these dropship cost savings actually occur on a per piece basis only, a per pound basis only, or both a per piece and per pound basis. Explain your answer fully.